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April 14, 2025

***VIA ECF and EMAIL: Chambers\_of\_Judge\_Gail\_Weilheimer@paed.uscourts.gov***

The Honorable Gail Weilheimer  
United States District Judge  
Eastern District of Pennsylvania  
7614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

Re: *Simona Ockley v. Radnor Township, et al.*  
Civil Action No.: 2:24-CV-04070 (GAW)

Dear Judge Weilheimer:

This Firm represents defendants Rockwell Glynn LP, Jeffrey Brydzinski, and Tyler Prete. Please accept this joint status report on behalf of all counsel, who have seen and agree with the contents and the filing of this letter.

Discovery in this matter continues to proceed well and on track for completion on or before May 6, 2025.

**Written Discovery**: Initial disclosures and written discovery has been exchanged and is being supplemented by each party as appropriate. The parties have collaborated on the scope of discovery and timing of any supplemental disclosures.

**Depositions**: To date, the parties have completed five defense fact witness depositions and started the deposition of Plaintiff, which will be completed on April 23. Plaintiff's counsel anticipates another 3-5 fact witness depositions and may designate an expert and proceed with expert disclosure and discovery. Mr. Gonzales and Mr. Bartos anticipate several additional depositions and the same are being coordinated between all counsel.

At this time, as fact discovery is set to conclude by May 6, 2025, the parties do not see any impediment to completing fact discovery by that time. The parties are working collaboratively with all diligence to schedule depositions as quickly as possible.

**Discovery disputes**: None to date.



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**ADR:** The parties are evaluating potential mediators both private and on the Court's mediation list, and may engage in that process in a way that does not delay the dispositive motion deadline or other deadlines set by the Court. Should this matter go to mediation, we will apprise the Court separately of the same.

**Dispositive Motions:** Defense counsel anticipate dispositive motions being filed and, in advance of the same, are discussing them with Plaintiff's counsel to determine if any agreements can be reached ahead of the same.

Should the court require any additional information or status updates regarding this matter, we will provide the same as directed by the Court.

Respectfully,

SPRUCE LAW GROUP, LLC



BY: Todd R. Bartos, Esquire

TRB/cls

cc: Gerard K. Schrom, Esq. (via ECF and email)  
John P. Gonzales, Esq. (via ECF and email)